

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES
 In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers, <i>Co-Chair</i> Donald A. Migliori, <i>Co-Chair</i> Robert T. Haefele, <i>Liaison Counsel</i> MOTLEY RICE LLC	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

July 10, 2025

The Honorable Sarah Netburn, U.S. Magistrate Judge
 United States District Court for the S.D.N.Y.
 Thurgood Marshall U.S. Courthouse, Room 430
 40 Foley Square
 New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)*

Dear Judge Netburn:

The Plaintiffs and Sudan, together with the Government, submit this request to address the Court's directions identified in the Order at ECF No. 10999.

The parties and the Government have been engaging in meet and confers regarding the parties' subpoenas and Touhy requests. Plaintiffs and the Government met for an hour-and-a-half meet and confer on June 23. Sudan and the Government met and conferred on June 13 and 18, and agreed Sudan would follow up on those discussions in writing, which Sudan did by letter on July 9. Further discussions are anticipated. Sudan and Plaintiffs continue to confer regarding the parties' respective obligations. The parties and the Government uniformly agree that additional time is necessary for their ongoing meet and confers to determine whether there are any issues they need the Court to address.

The parties and the Government jointly propose that the Court set a further deadline for the parties to report on the status of their discussions, July 31, 2025, and the parties and the Government will propose in that letter a range of mutually convenient dates for a status conference thereafter.

Respectfully submitted,

MOTLEY RICE LLC

By: /s/ Robert T. Haefele
 ROBERT T. HAEFELE
 28 Bridgeside Boulevard
 Mount Pleasant, SC 29465

COZEN O'CONNOR

By: /s/ Sean P. Carter
 SEAN P. CARTER
 One Liberty Place
 1650 Market Street, Suite 2800

The Honorable Sarah Netburn, U.S.M.J.

July 10, 2025

Page 2

Tel.: (843) 216-9184
Email: rhaefele@motleyrice.com

Liaison Counsel for the Plaintiffs' Executive Committee for Personal Injury and Death Claims on behalf of the Plaintiffs

Philadelphia, Pennsylvania 19103
Tel.: (215) 665-2105

Email: scarter@cozen.com

Co-Chair for the Plaintiffs' Executive Committee for Commercial Claims on behalf of the Plaintiffs

KREINDLER & KREINDLER LLP

By: /s/ Steven R. Pounian
STEVEN R. POUNIAN
485 Lexington Avenue
New York, New York 10017
Tel.: 212-687-8181
Email: spounian@kreindler.com

Attorneys for Ashton Plaintiffs

cc: The Honorable George B. Daniels, via ECF
All Counsel of Record via ECF